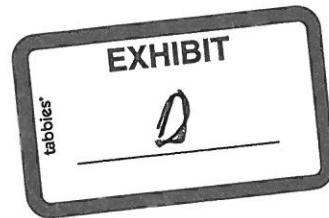


Instruction No. 16

Defamation (Count II)

You shall return your verdict for Shelley Mountjoy's claim against Defendant Jeffrey Wismer if she has proven by the greater weight of the evidence that:

- (1) Defendant Jeffrey Wismer, made any of the following statements:
- a. "It was like being at one of those Warren Jeffs 'love-ins' 12 yr olds-16yr old wives were being passed around like appetizers @ a Denny's Buffet Table. Long Duck Don [last name omitted] and CREEPER Norm were the first to wiggle my bean...it was like I was the oil, and they were Saudi princes. It was orgasmic, sultry, smokey, dark, and suffocatingly exotic."
 - b. "Ralph, I want you to talk dirty to me, and I want you to cover me in your loving vacuum of foul air."
 - c. "Drop me a line...I want to educate you in the ways of love."
 - d. "NORM you big wet sexy man...thanks for creepin' up behind me the other day...its was wonderful...you're the King of my Creeper Kingdom...prrrrr."



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- e. "You can be My Daddy, My Daddy, My Daddy. Come on, CREEPER Norm, you can make it rain your manhood down on meeeeeee. I love my pimp daddy Dr. Long Duck Don [last name omitted], he keeps my 16 yr old ass in check. To join the love-in fest of Polyarmory Pootang a tang a tang, please go here...[hyperlinks to websites of groups with whom Plaintiff Mountjoy is associated]."
- f. "I want you Jack...you put the air in Greasy Hair Sex Machine."
- g. "Jack the way you quoted my heavenly body last night @ the WASH polyamory group session was just divine. I want you Xian loving mouth and tongue to depress all over my virgin 16 yr old body. You put the HOT in Hot Fudge Sundae Jack-off the bearded sex machine."
- h. "Now I'm new to the area, so I'm no sure how this works...but Christopher and Shelley said you like casual gay sex. I scored some drugs from Shelley, so we can have a good time whenever you like."
- i. "I understand Shelley Mountjoy has been getting drugs from Greydon [last name omitted] & Brian [last name omitted] for years."

- j. "I'm new to the area, and new to this group...Shelley & Christopher begged me to join last week when we were having gay sex, smoking pot, & taking ruffees."
- k. "I am fast becoming good friends with Shelley Mountjoy & Christopher...they begged me to join this group when we were smoking pot and taking ruffees @ her mansion in Woodbridge....Christopher has a little penis, but I like him anyway b/c he makes me laugh. Shelley tells me you like young men with a big penis and solid buttocks...Anyway, I would like to talk to you about the things I would love to do to your penis in my juicy mouth."
- l. "If you want a good time or good drugs send Shelley Mountjoy an email and she will call her supplies [sic] Brian [last name omitted] & Greydon [last name omitted]."
- m. "SHELLEY MOUNTJOY...all she wanted to do is socialize, get drunk, take drugs, and win a popularity contest umong [sic] atheists...big woop!"
- n. "When you roll around naked in peanut butter at night masterbating with a water hose...do the voices come? What do they say? Is your dead boyfriend still talking to you?"

o. "The truth is out there...and the truth will set you free!

Allelujah! Thank God Almighty [sic] we are free at last! Ding
dong the wicked witch, which ol witch...the wicked
with...DING DONG the wicked witch is dead!!! And let the
news be spread, the wicked ol witch at last is dead!!!!"

p. "tick tock tick tock tick tock." Text: "Time is running
out...The time for honoring yourself will soon come to an
end...your higness [sic]."

and,

(2) The statement(s) are/were in regards to Shelley Mountjoy; and

(3) The statement(s) were seen by someone other than Shelley
Mountjoy; and

(4) The statement(s) is/are false; and

(5) The Defendant Jeffrey Wismer made the false statement(s)
knowing it/them to be false or, believing it/them to be true,
Defendant Wismer lacked reasonable grounds for such belief or
acted negligently in failing to ascertain the facts on which the
statement(s) was/were based.

ND

On these issues Shelley Mountjoy has the burden of proof.

You shall find your verdict for Defendant Wismer if Shelley Mountjoy failed to prove any one or more of the five (5) elements above.

Instruction No. 11

Presumed Damages (for Count II only)

If you find your verdict for a plaintiff, then that plaintiff is entitled to recover compensatory damages without any proof of actual or pecuniary injury. The statement(s) alleged in this case is/are understood to mean that the plaintiff(s) has committed the crime of illicit drug use, or the crime of illicit sexual acts with minors; or is unfit to perform the duties of his/her office within Beltway Athiests Meetup organization; or lacks integrity or is dishonest in performing the duties of his/her office within Beltway Athiests Meetup organization; or the effect of the words is prejudicial to the plaintiff(s) in his/her work. As a result, injury to the plaintiff(s) personal and business reputation, humiliation, and embarrassment is presumed.

*Granted
ND*

Instruction No. 17

Punitive Damages (Count II only)

If you find that a plaintiff is entitled to be compensated for his/her damages, and if you further believe by clear and convincing evidence that Defendant Jeffrey Wismer made the statements knowing they were false or made them so recklessly as to amount to a willful disregard for the truth, that is, with a high degree of awareness that the statement was probably false, then you may also ~~award~~ award punitive damages to punish Jeffrey Wismer for such actions and to serve as an example to prevent others from making such statements in the future.

If you award punitive damages, you must state separately in your verdict any amount you allow as compensatory damages and the amount you allow as punitive damages.

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